

Page 62

1 it didn't seem -- didn't seem any different. Some  
2 had silver on the edges and some had copper on the  
3 edges, but I wouldn't be able to tell you the  
4 difference.

5 Q. You couldn't tell by looking at a -- unless  
6 you had the drawing, you couldn't tell by looking  
7 at a piece of ceramic what it was made out of?

8 A. No.

9 Q. And you often got parts containing some  
10 kind of ceramic; you were asked to sandblast these  
11 parts, but you didn't know what the parts were made  
12 out of?

13 A. Right.

14 Q. Did you ever see a -- a red tag at Raytheon  
15 that said contains beryllia; do not sandblast,  
16 grind, machine or abrade?

17 A. No.

18 Q. Did you ever see a red tag that said  
19 contains beryllia; dust and fumes are toxic?

20 A. No.

21 Q. In fact, no one at Raytheon ever told you  
22 that the dust and fumes of beryllia are toxic,  
23 correct?

24 A. No.

Page 64

1 Q. Okay. Would you actually be sandpapering  
2 beryllium oxide ceramic, or some metal that was  
3 covering the ceramic?

4 A. I don't believe that you sandbla-- that you  
5 filed or sanded the ceramic. I believe that it was  
6 whatever needed to be done on the diameter to fit  
7 it.

8 Q. And the diameter that you filed or  
9 sandpapered was made of a -- of some kind of a  
10 metal; is that right?

11 A. I believe so.

12 Q. And do you know what the metal was?

13 A. I really don't recall at which time, you  
14 know, which piece I'm doing.

15 Q. Did you sometimes have to sand or file  
16 beryllium copper?

17 A. Occasionally.

18 Q. But never beryllium oxide?

19 A. I wouldn't know.

20 Q. Well, as I understand it, you never  
21 actually filed or sandpapered a ceramic material;  
22 only metals?

23 A. Right. We sandblasted the ceramic.

24 Q. All right. Did you use something called a

Page 63

1 Q. Let's talk about the -- well, actually, I  
2 guess I should have said at the beginning, if you  
3 ever want a break, feel free to ask for one. I  
4 know this is --

5 MR. HONIK: If you're going to shift  
6 topics, this might be a good time to take five  
7 minutes.

8 MR. UBERSAX: Yeah, why don't we do  
9 that. That's fine.

10 VIDEO OPERATOR: Going off the record,  
11 10:27 a.m.

12 (Off the record.)

13 VIDEO OPERATOR: On the record, 10:48  
14 a.m.

15 Q. (BY MR. UBERSAX) Ms. Genereux, you talked  
16 earlier about using a -- a file on some -- some of  
17 the parts you worked with. Did you also use  
18 sandpaper on any of these parts?

19 A. Occasionally.

20 Q. Okay. And can you tell us what you did  
21 with the sandpaper?

22 A. The same thing; you --

23 Q. Same thing you did with the file?

24 A. Right.

Page 65

1 Drommel tool?

2 A. On occasion.

3 Q. Okay. What kind of tool is that?

4 A. It's like a little drill with a hard piece  
5 on the end.

6 Q. And what did you use that for?

7 A. If -- if it called for it being used to  
8 remove an excess burr or something on the material.  
9 It was tools used to bring them in tolerance.

10 Q. Did you use the Drommel tool on any ceramic  
11 material, or was that only on metals?

12 A. On metals.

13 Q. Did you sometimes use the Drommel tool on  
14 beryllium copper?

15 A. Could have been, yes.

16 Q. Okay. When you did that, would that create  
17 any -- any dust?

18 A. It always created something. Whenever  
19 you're using something, it would create some kind  
20 of dust.

21 Q. Did you perform any other operation on the  
22 pieces that you worked with in this lab that was  
23 abrasive or would cause some dust to be released?

24 A. Other than --

17 (Pages 62 to 65)



Page 86

1 Q. And why did you leave the company?  
 2 A. I was expecting.  
 3 Q. And when -- when did you have your child?  
 4 A. June 28th, 1991.  
 5 Q. You didn't go back after delivering your  
 6 child?  
 7 A. No.  
 8 Q. And in fact, you haven't worked since 1990;  
 9 is that right?  
 10 A. That's correct.  
 11 Q. And is that because of medical problems  
 12 that you've had?  
 13 A. Yes.  
 14 Q. What -- what medical problem kept you from  
 15 going back to work after you had your child in June  
 16 of '91?  
 17 A. At the beginning, I had carpal tunnel.  
 18 Q. Carpal tunnel syndrome?  
 19 A. Yes. They did -- they did the surgeries to  
 20 each hand, but the right one never came back right.  
 21 Q. And how long -- how long did the carpal  
 22 tunnel syndrome and the surgeries for that keep you  
 23 out of work?  
 24 A. I don't know. I was -- I was out. I had

Page 88

1 had --  
 2 Q. You had?  
 3 A. Well, that's around the time that the  
 4 Parkinsonism came through, and there was problems  
 5 there.  
 6 Q. Okay. So the pregnancies and the carpal  
 7 tunnel syndrome kept you out of work until you were  
 8 diagnosed with Parkinson's; is that right?  
 9 A. Yeah.  
 10 Q. And then the Parkinson's was a separate  
 11 problem which also kept you out of work, correct?  
 12 A. Right.  
 13 Q. And that's -- the Parkinson's, that's kept  
 14 you out of work since then; is that right?  
 15 A. I had the stroke in '96.  
 16 Q. Has the stroke had lasting health effects  
 17 on you?  
 18 A. Yes.  
 19 Q. What are the lasting effects of the stroke?  
 20 A. My right leg hasn't recovered. I have  
 21 problems with the process of the bottom section of  
 22 my leg.  
 23 Q. Is the -- the lower part of your right leg  
 24 actually paralyzed?

Page 87

1 -- when I became pregnant, not knowing that I got  
 2 pregnant for the second child, you know, I was  
 3 still in therapy for my right hand.  
 4 Q. So you had another pregnancy, then?  
 5 A. Yes.  
 6 Q. Okay. And was that a successful -- did  
 7 that go to term?  
 8 A. Yes.  
 9 Q. And when was that child delivered?  
 10 A. December '92.  
 11 Q. And during that pregnancy, the second  
 12 pregnancy, you were still having problems with your  
 13 carpal tunnel --  
 14 A. Yes.  
 15 Q. -- syndrome? In fact, you had your second  
 16 surgery in 1992, didn't you?  
 17 A. January 1992.  
 18 Q. Okay.  
 19 A. No. Wait a minute. I'm not quite sure.  
 20 Was it January -- yeah, January '92. She was born  
 21 December '92.  
 22 Q. Okay. Then in 1993, was the carpal tunnel  
 23 syndrome still affecting you, or --  
 24 A. There was still problems with it. We

Page 89

1 A. It doesn't respond. Like I drive left  
 2 foot.  
 3 Q. And your right leg's been like that since  
 4 the stroke in 1996?  
 5 A. Yes.  
 6 Q. So you haven't been able to go back to work  
 7 because of the Parkinson's and the stroke; is that  
 8 right?  
 9 MR. HONIK: Object to the form of the  
 10 question and to the extent it calls for a medical  
 11 conclusion, medical expert opinion. You can  
 12 answer.  
 13 A. It isn't mainly because of one thing. It's  
 14 just the therapy through the stroke was difficult.  
 15 I would have a hard time, um, moving. Breathing  
 16 became an issue, just like -- like very slow, like  
 17 your hair turning gray, you know, just --  
 18 Q. (BY MR. UBERSAX) Do you still have a  
 19 problem with the carpal tunnel syndrome, or has  
 20 that cleared up?  
 21 A. I don't know. They would have to do more  
 22 tests, I guess. I don't know. I don't do  
 23 repetitive things.  
 24 Q. Okay. Have you also had problems with

23 (Pages 86 to 89)